

STATE OF COLORADO

Bill Owens, Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
AN EQUAL OPPORTUNITY EMPLOYER

Bruce McCloskey, Director
6060 Broadway
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*For Wildlife-
For People*

July 9, 2004

Sandra A. Stavnes
Environmental Protection Agency
Region 8
999 18th St, Suite 300
Denver, CO 80202-2466

Via Fax and Hard Copy

Dear Ms. Stavnes:

This letter is in response to your letter of early June, 2004, concerning additional information needed relative to our UIC Class V permit for our Foothills Wildlife Health Laboratory west of Ft. Collins, CO. Although no date appears on the letter, our in-stamp shows that it was accepted into our section's office on June 10, 2004.

The information requested is as follows and/or is referenced to enclosed documents.

- a description of the tests conducted to verify that the septic system at the Foothills Laboratory has not been sterilized by the prion inactivation solutions used during the laboratory decontamination process, the person who conducted these tests including their address and phone number, and the results of the tests.
 - The samples were taken on April 1 and 10th, 2003. The contractor was Alberts Water & Wastewater Services, 305 W Magnolia St, Ft Collins, CO 80521; 970 494-1610. Their report is included as an attachment to this document and describes their sampling procedures, test results, and conclusions.
 - When we received your letter, Dr. Baeten attempted to schedule a re-test and learned that this firm is no longer in business. She was also unsuccessful in arranging for testing with a second company which did not return our calls. Per email communication with Valois Shea of your staff, earlier this week, we are enclosing the report provided by Alberts Water for your review. If you feel further testing is warranted, we are happy to do so but will appreciate some names and contact information for other contractors who may be able to do the required work.
- the average daily flow rates of waste fluid into the septic system
 - The spreadsheet we use to track our monthly volumes is enclosed. We do not calculate daily averages as we use this same format in our Craig lab as required by our permit. However, I have reiterated the numbers below and calculated a daily average by month.

Month	Environ LpH Used	Water Used	Total FluidUse	Daily Average
Sept 03	4 gallons	1660 gallons	1664 gallons	55.4 gallons
Oct 03	4 gallons	2935 gallons	2939 gallons	94.8 gallons
Nov 03	3 gallons	1878 gallons	1881 gallons	62.7 gallons
Dec 03	3 gallons	1730 gallons	1733 gallons	55.9 gallons
Jan 04	2 gallons	1386 gallons	1388 gallons	44.7 gallons
Feb 04	3 gallons	1025 gallons	1028 gallons	35.4 gallons
Mar 04	2 gallons	2010 gallons	2012 gallons	64.9 gallons
Apr 04	1 gallon	687 gallons	688 gallons	22.9 gallons
May 04	1 gallon	542 gallons	543 gallons	17.5 gallons

DEPARTMENT OF NATURAL RESOURCES, Russell George, Executive Director
WILDLIFE COMMISSION, Philip James, Chair • Jeffrey Crawford, Vice-Chair • Brad Phelps, Secretary
Members, Bernard Black • Tom Burke • Rick Enstrom • Claire O'Neal • Robert Shoemaker • Ken Torres
Ex Officio Members, Russell George and Don Ament

- the minimum and maximum average daily flow rates
 - Minimum average daily flow rate: 17.5 gallons
 - Maximum average daily flow rate: 94.8 gallons
- chemical analysis of fluid samples collected from the distribution box or the septic tank at the Foothills Laboratory
 - included in the report from Alberts Water Services enclosed with this document
- a detailed description of the current BMPs the laboratory now uses for the handling and disposal of laboratory wastes
 - Our laboratory protocols are part of a complete protocols notebook rather than in a single document. We have provided comments on your draft BMP's several times over the past 18 months, outlining what we are and have been doing over the past 18 months with our wastes. We will review our notebook and provide the relevant pages within the next week.
- the concentrations of LpH solutions used
 - As noted on the enclosed liquid waste monitoring spreadsheet, LpH is used in concentrations varying from 5-7%. We use 5% LpH for all soaking and when using the hand spray pump to spray surfaces. LpH is diluted and concentration varies when taken from the AirChem "quick fill workstation" for decontamination of floors and work surfaces, and ranges from 5-7%.
- estimated volume of LpH solutions used
 - This information is contained in the enclosed spreadsheet on fluid use and is summarized on page 1 as well.
- estimated volume of LpH solution that goes down the drains into the septic system
 - as noted on the enclosed spreadsheet, evaporation from surfaces and soaking containers is probably negligible and we assume that it enters the septic system in the amounts listed above. After straining to remove particulates, all 5% LpH is diluted and put into the drain. The soaking container amounts are included in the totals listed.

Please do not hesitate to let me know if additional septic system is required or if you have additional questions. I can be reached at 303 291-7275 or at kathi.green@state.co.us

Sincerely,

Katherine A. Green
Disease Mgt Coordinator

cc: G. Miller, L. Baeten, M. Miller, L. Wolfe, T. Remington, J. VerSteeg, B. McCloskey, T. Monahan